

1 Joseph H. Harrington
2 United States Attorney
3 Eastern District of Washington
4 Ann T. Wick
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUN 18 2019

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRENT DREXEL HOWARD,

Defendant.

4:19-CR-6036-SMJ

INDICTMENT

Vio: 18 U.S.C. § 2252A(a)(2)(A),
(b)(1)
Receipt of Child Pornography
(Count 1)

18 U.S.C. § 2252A(a)(2)(A),
(b)(1)
Distribution of Child Pornography
(Count 2)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)
Possession of Child Pornography
(Count 3)

18 U.S.C. § 2251(a), (e)
Attempted Production of Child
Pornography
(Count 4)

18 U.S.C. § 2253
Forfeiture Allegations

1 The Grand Jury charges:
2

3 COUNT 1
4

5 Beginning on or about November 20, 2018, and continuing until on or about
6 June 5, 2019, in the Eastern District of Washington and elsewhere, the Defendant,
7 TRENT DREXEL HOWARD, did knowingly receive child pornography, as defined
8 in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate
9 commerce by any means, including by computer, to wit: images depicting minor and
10 prepubescent children engaging in sexually explicit conduct, including but not limited
11 to the lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C. §
12 2252A(a)(2)(A), (b)(1).
13

14 COUNT 2
15

16 Beginning on or about November 20, 2018, and continuing until on or about
17 May 28, 2019, in the Eastern District of Washington and elsewhere, the Defendant,
18 TRENT DREXEL HOWARD, did knowingly distribute child pornography, as defined
19 in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate
20 commerce by any means, including by computer, to wit: images depicting minor and
21 prepubescent children engaging in sexually explicit conduct, including but not limited
22 to the lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C.
23 § 2252A(a)(2)(A), (b)(1).
24

25 COUNT 3
26

27 On or about June 5, 2019, in the Eastern District of Washington, the Defendant,
28 TRENT DREXEL HOWARD, did knowingly possess material which contained one
or more visual depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A),
including images of prepubescent minors and minors who had not attained twelve
years of age, the production of which involved the use of a minor engaging in sexually
explicit conduct, and which visual depictions were of such conduct; that had been
mailed, shipped and transported in interstate and foreign commerce, and which were
29

1 produced using materials that had been mailed, shipped and transported in interstate or
2 foreign commerce, by any means including computer, all in violation of 18 U.S.C.
3 § 2252(a)(5)(B), (b)(2).

4 COUNT 4

5 Beginning on an unknown date, but at least by on or about August 17, 2012,
6 and continuing until on or about June 5, 2019, in the Eastern District of Washington,
7 the Defendant, TRENT DREXEL HOWARD, did knowingly attempt to use a minor
8 child, to engage in sexually explicit conduct, for the purpose of producing any visual
9 depiction of such conduct, such visual depiction to be produced using materials that
10 have been mailed, shipped, and transported in and affecting interstate and foreign
11 commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a),
12 (e).

13 NOTICE OF FORFEITURE ALLEGATIONS

14 The allegations contained in this Indictment are hereby realleged and
15 incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C.
16 § 2253.

17 Pursuant to 18 U.S.C. § 2253, upon conviction of any of the child pornography
18 charges in Counts 1 – 4 of this Indictment, the Defendant, TRENT DREXEL
19 HOWARD, shall forfeit to the United States any visual depiction described in section
20 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film,
21 videotape, or other matter which contains any such visual depiction, which was
22 produced, transported, mailed, shipped or received in violation of this chapter;

23 //

24 //

25 //

26 //

27 //

1 any property, real or personal, constituting or traceable to gross profits or other
2 proceeds obtained from such offenses; and, any property, real or personal, used or
3 intended to be used to commit or to promote the commission of such offenses, or any
4 property traceable to such property.

5 DATED this 18 day of June, 2019.

6
7 A TRUE BILL
8
9
10
11
12
13

Fore

14 
15 Joseph H. Harrington
16 United States Attorney

17 
18 Ann T. Wick
19 Assistant United States Attorney